UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEBT RESOLVE, INC.,

Plaintiff,

vs.

APOLLO ENTERPRISE SOLUTIONS, LLC,

Defendant.

Case No.: 07 Civ. 4531 (JSR)

CERTIFIED COPY

VIDEOTAPED DEPOSITION OF G. CHRISTOPHER IMREY

Newport Beach, California Tuesday, July 24, 2007

CONFIDENTIAL

Reported by: Job No. 5844

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	DEFOSITION OF G. CHRISTOPHER IMREY
2	Parrish, CSR No. 9124, a
3	Certified Shorthand Reporter for the State of
4	California, with principal office in the County of
5	Los Angeles, commencing on Tuesday, July 24, 2007,
6	8:36 a.m., at 660 Newport Center Drive, Suite 1600,
7	Newport Beach, California.
8	
9	
10	
11	APPEARANCES OF COUNSEL:
12	
13	For the Plaintiff:
14	DREIER, LLP BY: DANIEL A. LADLOW, ESQ.
15	499 Park Avenue P. BAUER, ESQ.
16	New York, New York 10022 212.710.5964 / 212.600.0400.D.
17	dladlow@dreierllp.com
18	For the Defendant:
19	STRADLING YOCCA CARLSON & DAVING
20	BY: JAN P. WEIR, ESQ. 660 Newport Center Drive
21	Newport Beach California
22	949.725.4000 / 949.725.4100 Fax
23	ALSO PRESENT:
24	
25	Tim Nolan, Videographer

1	<u>I - N - D - E - X</u>	
2	EXAMINATION BY:	
3	Mr. Ladlow	PAGE
4		6
5	<u>E - X - H - I - B - I - T - S</u>	
6	PLAINTIFF'S DESCRIPTION	D# CF
7	1 Letter dated 7/16/07 and screen shot documents	PAGE 44
8 9	2 Five pages Apollo Enterprise Solutions documents dated 12/21/06	47
10	Four-page document entitled "Web-Based Payment and Collection System for Debtor Self-Settlement"	50
12 13	Four-page document explaining Apollo's Intelligent Debt Solutions	58
14 15	Document entitled "Consumer Collections Automation, A White Paper on Apollo Enterprise Solutions' CCA Solution"	70
16 17	6 United States Patent Application Publication dated 4/20/06	167
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1	Tuesday, July 24, 2007	
2	8:36 p.m.	
3		
4	THE VIDEOGRAPHER: Good morning. We're on	
5	the record at 8:36 a.m. on July 24, 2007, for the	08:36
6	videotape deposition of Mr. Christopher Imrey.	08:36
7	We are taking this deposition at 660	
8	Newport Center Drive in Newport Beach, California,	
9	on behalf of plaintiff in the action entitled Debt	
10	Resolve vs. Apollo Enterprise Solutions, Case No.	
11	07 Civ. 4531 (JSR).	08:37
12	My name is Tim Nolan. I'm a video	
13	production specialist from DigiDep in Los Angeles.	
14	This is the beginning of disk 1 of volume 1.	
15	Would counsel present please identify	
16	yourselves for the record.	08:37
17	MR. LADOW: I'm Dan Ladow for Plaintiff	
18	Debt Resolve, and with me today is Michael Bauer.	
19	We're both from Dreier, LLP.	
20	MR. WEIR: Jan Weir for the defendant	0.0 . 2.7
21	Apollo, representing the witness.	08:37
22	THE VIDEOGRAPHER: Thank you.	
23	The witness may be sworn.	
24		
25	///	
L		

1		ľ
	G. Christopher Imrey,	08:3
2	do a withess on benalf of the Plaintiff, was	
3	and testified as follows:	
4	would you raise your right	
5	hand, please.	
6	Do you solemnly swear that you shall tell	
7	the truth, the whole truth, and nothing but the	
8	truth, so help you God?	
9	THE WITNESS: I do.	
10		
11	EXAMINATION	
12	BY MR. LADOW:	
13	Q Good morning, Mr. Imrey. We've already	
14	introduced ourselves. I'm Dan Ladow from Dreier,	
15	LLP. You understand I'm representing Debt Resolve	
16	in this action; is that fair?	08:38
17	A (No audible response.)	
18	Q Do you understand that I'm representing	
19	Debt Resolve in this action?	
20	A I understand that you're the attorney for	
21	Debt Resolve.	08:38
22	Q Okay.	
23	Have you ever been deposed before?	
24		
25	deposed before.	
	Q I'm going to ask you a series of	08:38

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